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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) No. CR 11-901 WHA
Plaintiff,) STIPULATION TO WAIVE TIME FROM
v.) JULY 25, 2012 TO AUGUST 24, 2012
JARRETT PITTMAN-WRIGHT) AND ~~PROPOSED~~ ORDER
Defendant.)

The defendants, JARRETT PITTMAN-WRIGHT, represented by attorney ERICK L. GUZMAN, and DEVA HARRIS, represented by DANIEL BLANK, Assistant Federal Public Defender, and the government, represented by HEATHER M. MELTON, Special Assistant United States Attorney, stipulate that time from July 25, 2012 through August 24, 2012 should be excluded from the Speedy Trial Clock.

This matter is on calendar before the Court this afternoon at 2:00 p.m. The Court has ordered the parties to advise whether they have been able to reach a stipulation as to an exclusion of time; the parties now advise that they have reached such an agreement.

**STIPULATION AND [PROPOSED] ORDER TO WAIVE TIME
CR 11-00901 WHA**

1 The parties agree that the time between July 25, 2012 and August 24, 2012 is properly
2 excluded for continuity of counsel and effective preparation of counsel, pursuant to Title 18
3 United States Code, Section 3161(h)(7)(B)(iv). The parties are engaged in the review of
4 discovery and counsels for both the government and both defendants have scheduling conflicts,
5 at different times, between July 25, 2012 and August 24, 2012.

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7 DATED: July 25, 2012

Respectfully submitted,

8 MELINDA HAAG
9 United States Attorney

10 By _____/s/
11 HEATHER M. MELTON
12 Special Assistant U.S. Attorney

13 DATED: July 25, 2012

14 By _____/s/
15 ERICK GUZMAN, ESQ.
16 Attorney for Defendant Pittman-Wright

17 DATED: July 25, 2012

18 BY _____/s/
19 DANIEL BLANK
20 Assistant Federal Public Defender

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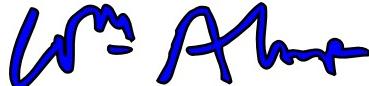
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28 STIPULATION AND [PROPOSED] ORDER TO WAIVE TIME
CR 11-00901 WHA

1 [PROPOSED] ORDER
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3 Based upon the representation of counsel and for good cause shown, the Court finds that
4 failing to exclude the time between July 25, 2012 and August 24, 2012 would unreasonably deny
5 defense counsels the reasonable time necessary for effective preparation and would unreasonably
6 deny all parties of continuity of counsel, taking into account the exercise of due diligence. 18
7 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding
8 the time between July 25, 2012 and August 24, 2012 from computation under the Speedy Trial
9 Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, IT IS
10 HEREBY ORDERED that the time between July 25, 2012 and August 24, 2012 shall be
11 excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(B)(iv).

12 DATED: July 25, 2012.



13 William Alsup
14 UNITED STATES DISTRICT JUDGE
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STIPULATION AND [PROPOSED] ORDER TO WAIVE TIME
CR 11-00901 WHA